

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Paul J. Smith Sr.

Plaintiff,

✓

Taylor et al., Danberg,

Carroll, Bullis, et al.

Defendants

C.A. No. 06-432 (GMS)

C.A. No. 07-446 (GMS)

C.A. No. 05-139 (GMS)

DATE 10-30-2007

"MEMORANDUM"

Motion to Amend to Complaint

Complaint in a Civil Action, the fact Pleading  
of the Plaintiff, setting out the facts on  
which the claim for relief, Fed. R. Civ. Proc. 3,  
under modern court rules.

Cause of Action A claim used the legal right  
to sue, if the complaint fails to state a  
proper cause of action. it will be dismissed.

Civil Action to protect my private, civil right.  
Money Damages imposed

Class Action Lawsuit, Compensatory Damages  
and General Damages.

Defendants - want a justification, just, lawful excuse for an act; reasonable excuse, showing of a sufficient reason in court why defendants did what he is called upon to answer for, so as to excuse liability.

Regulations - Rules or Directives issued by Administrative Agencies.

Not having within racketeer influence and corrupt organized conspiracy to commit extortion, organized crime, here at the Delaware Correctional Center near Smyrna, DE 19977.

Plaintiff, Disability - State of not being fully capable of performing all functions mental and physical by the discrimination - received unequal treatments - dwelling conditions while being incarcerated or held at the Delaware Correctional Center.

Liability and obligation to a duty which eventually must be performed; and obligation to pay money damages towards confinement that's unconstitutional by law.

Pain and suffering damages that one may recover for physical and mental pain and

Suffering that result from a wrong done or suffered, misconduct, corrupt. Misbehavior of the duties. (Recovery Money Demanded).

Duty - Obligation which results in the liability under the law of negligence, if an individual owes to other a duty of care, he must conduct himself so as to avoid negligent injury to them, Good faith,

Plaintiff, EMOTIONAL DISTRESS - EXTREME PERSONAL SUFFERING CAUSED BY THE INTENTIONAL OR NEGLIGENT, DELIBERATELY. (SEEK MONETARY AWARDS).

Plaintiff - State Good Cause, SUBSTANTIAL OR LEGALLY SUFFICIENT REASON(S) FOR DOING SOMETHING. (EVIDENCES).

GRACE PERIOD - SET UPON DEFENDANTS, - TO fix CONDITIONS, DEFENDANTS fell obligations AS OF 10-30-2007.

Plaintiff state GRANT COMPENSATION - GROSS NEGLIGENCE.



GUARDIAN - ONE WHO LEGALLY HAS CARE AND MANAGEMENT OF THE PERSON OR ESTATE OR BOTH OF AN INCOMPETENT WHO CANNOT ACT FOR HIMSELF - PERSON TO PROVIDE FOR THEIR CARE, WELFARE, EDUCATION, MAINTENANCE AND SUPPORT.

HABITABILITY - OF THE CONDITION OF RESIDENTIAL OR OTHER PREMISES BEING REASONABLY FIT FOR OCCUPATION, THE HEALTH, AND SAFETY.

HARD SHIP - UNNECESSARY - INJURY - IRREPARABLE INJURY DAMAGE, HARM,

DEFENDANT(S) - IGNORANCE - LACK OF KNOWLEDGE  
IGNORANCE OF THE LAW DOES NOT JUSTIFY AN ACT.

PLAINTIFF, INDIGENT A PERSON WHO IS POOR FINANCIALLY DESTITUTE IN A LEGAL CONTEXT UNABLE TO HIRE A LAWYER OR OTHER MEET THE EXPENSE OF DEFENDING. INJURY - WRONG OR DAMAGE DONE TO ANOTHER AND I AM NOT A JAILHOUSE LAWYER TO SELF - STUDY OF LAW.

DEFENDANT'S - INTENT, A STATE OF MIND WHEREIN THE PERSON KNOWS AND DESIRES THE CONSEQUENCES OF ONE'S OWN ACT WHICH FOR PURPOSES LIABILITY.

PLAINTIFF, STATE - REPRESENTATION IN CONSTITUTIONAL LAW, AMENDMENT CIVIL CASE'S.

Joe [Signature] 140003  
D-West Building  
10-30-2007



DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977

W. PAUL I. SMITH Sr.  
SBI# 14003 UNIT D-103

2100 E193410851



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Clerk of the Court

UNITED STATES DISTRICT COURT

844 N. KING STREET, LOCKBOX 18

WILMINGTON, DELAWARE 19801-3574

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